

EMERGENCY CONTINGENCY PLAN
MULTI-SERVICE SITE
DAYTON, MONTGOMERY COUNTY, OHIO

March 9, 2011

The Multi-Service (MS) Site is located at 1962 Radio Road in Dayton, Montgomery County, Ohio 45431 (see Attachment 1, labeled as Figure A-1). The 27,589-square-foot MS facility operated at the Site from the mid-1990s to March 2010 and laundered industrial work gloves, rags, ink towels and shop towels. The dry cleaning process used a perchloroethylene (PCE)-based solvent known as "360 Solvent" with a flashpoint of 105 degrees Fahrenheit (°F). The Site is located on 7.121 acres in an industrial park in northeastern Dayton. The Site is bordered to the north and east by the Five Rivers Metro Parks bike path and a parking lot; to the south by a wooded property; and to the west by an open lot used by a tree service company for wood storage (see Attachment 2, labeled as Figure A-2). Commercial businesses are located within 500 feet of the Site, and the closest residences are located 300 feet south and 400 feet north of the Site.

SITE HISTORY

Based on the Ohio Environmental Protection Agency's (Ohio EPA) Division of Surface Water concerns regarding waste management at the Site, in May 2009, the Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance assistance inspection at the Site. At that time, the MS facility was not exceeding the 90-day storage limit for hazardous wastes stored in totes. Subsequent hazardous waste inspections were conducted on June 4 and 15, 2009. Based on these inspections, it was determined that the MS facility was exceeding the 90-day storage limit for hazardous waste.

Throughout 2009 and 2010, the MS facility continued to violate the 90-day storage limit for hazardous waste. The Ohio EPA DHWM referred the MS facility for enforcement in October 2009. The Ohio EPA Director's Draft Findings and Orders were sent to the MS facility in February 2010.

During inspections at the Site on January 12 and 21, 2010, the Ohio EPA DHWM observed a leaking hazardous waste drum that had been documented during earlier inspections. The leak from the drum was corrected during an inspection on January 27, 2010. During Site inspections on April 7 and 21 and May 5, 2010, another leaking drum was observed, but no corrective actions were taken until the drum was shipped off site on May 28, 2010.

Due to inaction by the MS facility and rumors of bankruptcy, the Ohio EPA referred the MS facility to the Attorney General's Office for enforcement. On April 16, 2010, the Attorney General's Office met with MS in an attempt to obtain compliance.

On April 22, 2010, the Ohio EPA sampled wastes from the two equalization tanks (#1 and #2), the Chemical Mixing Tank, the Wastewater Treatment Pit, and the wastewater treatment unit. Samples from Equalization Tank #2, the Chemical Mixing Tank, and the Wastewater Treatment Pit had flashpoints of 137, 132, and 131 °F, respectively, indicating that the tank contents were ignitable hazardous wastes. In addition, a liquid sample from the Chemical Mixing Tank had a Toxicity Characteristic Leaching Procedure (TCLP) PCE concentration of 30 milligrams per liter

(mg/L), which exceeds the TCLP PCE regulatory limit of 0.7 mg/L, thus indicating that the tank contained a toxic waste.

On November 23, 2010, the Ohio EPA accompanied the Dayton Fire Department (DFD) on an inspection of the MS facility. The DFD was concerned about the storage of flammable materials and a non-operational fire suppression system at the Site.

On November 24, 2010, the DFD issued a Notice of Violation to the MS facility, ordering the removal of all flammable and combustible materials from the Site.

In a letter dated January 7, 2011, the DFD formally requests assistance from the U.S. EPA to determine if the Site meets the criteria for a time-critical removal action.

In a letter dated January 24, 2011, the Ohio EPA formally requests assistance from the U.S. EPA to determine if the Site meets the criteria for a time-critical removal action. According to the Ohio EPA, since cessation of operations at the Site in March 2010, all on-site tanks are now considered waste tanks. Also according to the Ohio EPA, tanks associated with the solvent recovery process located in the Tank Room contained dirty solvent presumed to be ignitable. One of these tanks leaked waste solvent to a depth of approximately 2 inches in the Tank Room. In addition, three tanks associated with the wastewater treatment unit contained ignitable wastes.

On January 27, 2011, U.S. EPA conducted a site assessment at the MS Site and observed eight tanks, two pits and approximately 50 drums, totes and small containers (5-gallons or less) (see Attachment 3, labeled as Figure 3-1). During the site assessment, U.S. EPA collected two liquid tank samples; two liquid samples from 250-gallon totes, a combination of four liquid and solid samples from small containers; a sludge/liquid sample from the wastewater treatment pit, two liquid samples from square containers (solvent recovery tanks) adjacent to the dry cleaning machines; and a composite sample of the black sludge observed in the dry cleaning trenches. Analytical results indicated toxic, ignitable and corrosive hazardous substances are present on Site.

U.S. EPA plans to initiate a removal action at the site in April 2011. U.S. EPA plans to undertake the following actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, a Site Emergency Contingency Plan and a Site Security Plan;
2. Inventory and perform hazard characterization on all substances contained in tanks, totes, drums, containers and tanks;
3. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
4. Dismantle, decontaminate and remove process equipment, tanks and building components associated with the product process area, as necessary;
5. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440); and
6. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

HOURS OF OPERATION

When the removal begins, U.S. EPA crews will be on site Monday through Friday (0700 to 1800 hours). A security guard will be on site during non-working hours and stationed in the side office trailer. A copy of the Emergency Contingency Plan will be available on site, if needed.

ADDITIONAL INFORMATION

U.S. EPA has posted the following website for further information:

<http://www.epaosc.org/multiservicesite>

In the event of a required response by local emergency authorities during site removal activities, the following protocols provide necessary guidance for the following potential response events:

Vandalism/Trespass;

Medical Emergencies; and

Fire/Explosion.

VANDALISM/TRESPASS

In the event of vandalism/trespass at the site, the Dayton Police Department (DPD) will respond to the U.S. EPA Command Post office trailer (located within the fenced area on the south side of the facility building). Attempts will be made by the law enforcement to communicate with the offenders from the site perimeter via loudspeaker and to apprehend the offenders following their exit from the building. Members of the DPD should wear gloves or immediately wash their hands following apprehension of the offenders. The DPD and/or the on-site security guard will immediately advise U.S. EPA OSC Steve Renninger of any incidents of trespass or vandalism.

MEDICAL EMERGENCIES

Rescue operations inside the building, if necessary, should be conducted by personnel wearing Level D personal protective equipment with disposable latex booties. The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with contaminants or the ground. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum emergency decontamination should be completed. If possible, decontamination and removal of injured personnel from the exclusion zone will be conducted prior to arrival of emergency medical services (EMS). EMS will pick up injured personnel at the U.S. EPA Command Post office trailer.

For emergencies requiring transport to a hospital, **911** will be called. The victim should be transported to Miami Valley Hospital, located at 1 Wyoming Street, Dayton, Ohio, **(937) 208-2440** (3.5 miles). A map showing directions to the hospital from the site is included as Attachment 4.

FIRE/EXPLOSION

To activate fire department resources, the Dayton Fire Department dispatcher will be notified by calling **911**. In addition, U.S. EPA OSC Steve Renninger will be contacted on his cell phone at (513) 260-7849.

During a hazardous materials incident, law enforcement will control perimeter access; however, they are not equipped with protective clothing and their main function will be site control and preventing unauthorized persons from entering the hazard area. Law enforcement should not enter the exclusion zone (i.e. the building).

The fire department when called out to the scene of a hazardous materials emergency has the duty and responsibility to save lives, prevent injuries, reduce property loss, and to restore vital services. Command of the emergency will be established by the officer of the first arriving fire company. The command will be transferred utilizing fire department staff, under the Incident Command System. The Fire Chief will be in charge of the incident until such time that he relinquishes that authority.

Telephone numbers of personnel who should be contacted in the event of an incident are listed on the attached page. At a minimum, the following personnel will be notified;

U.S. EPA On-Scene Coordinator	Steve Renninger
Dayton Fire Department	Andrew Steele
Dayton Regional Hazmat	Denny Bristow

In the event of heavy smoke or toxic gas emission, the fire department may initiate "shelter-in-place" of the neighboring areas. If this tactic is necessary, it should proceed according to Montgomery County EMA Guidelines. U.S. EPA's START contractor will also be available to assist with perimeter air monitoring.

**LIST OF CONTACTS
MULTI-SERVICE SITE
DAYTON, MONTGOMERY COUNTY, OHIO**

<u>LOCAL AGENCY</u>	<u>PHONE#</u>	<u>CONTACT</u>
Dayton Fire Department	911 937-333-FIRE 937-333-4522 937-333-4527	Emergency Dispatcher Andrew Steele Carson Cockayne
Dayton Police Department	911	Emergency Dispatcher
Dayton Regional Hazardous Materials Response Team	937-512-5103 office 937-901-5112 cell	Denny Bristow
Montgomery County EMA	937-224-8936	Jeffery Jordan
Montgomery/Greene County LEPC	937-531-6548	Mathew Lindsay
Miami Valley Hospital	937-208-2440	
<u>FEDERAL/STATE</u>		
U.S. EPA On-Scene Coordinator	(513) 260-7849 cell	Steve Renninger
Ohio EPA (Division of Hazardous Waste Management)	(937) 285-6093	Cathy Altman
U.S. EPA Region 5 Response (Emergency only)	(312) 353-2318	(24-hour # that rings in Chicago or Detroit and can assist or locate the OSC)
National Spill Response Center	(800) 424-8802	24-hour Spill Reporting
Ohio EPA Environmental Response	(800) 282-9378	24-hour Spill Reporting
<u>COMMAND POST PHONE NUMBERS</u>		
WESTON START	(513) 703-3092 cell (937) 313-5620 cell	John Sherrard WESTON Emer. Resp.
Environmental Quality Management (ERRS)	(513) 543-3909 cell (513) 314-3503 cell	Steve Letany – Resp. Mgr Tyrone Price – Cost Acct.

ATTACHMENT 1
SITE LOCATION MAP

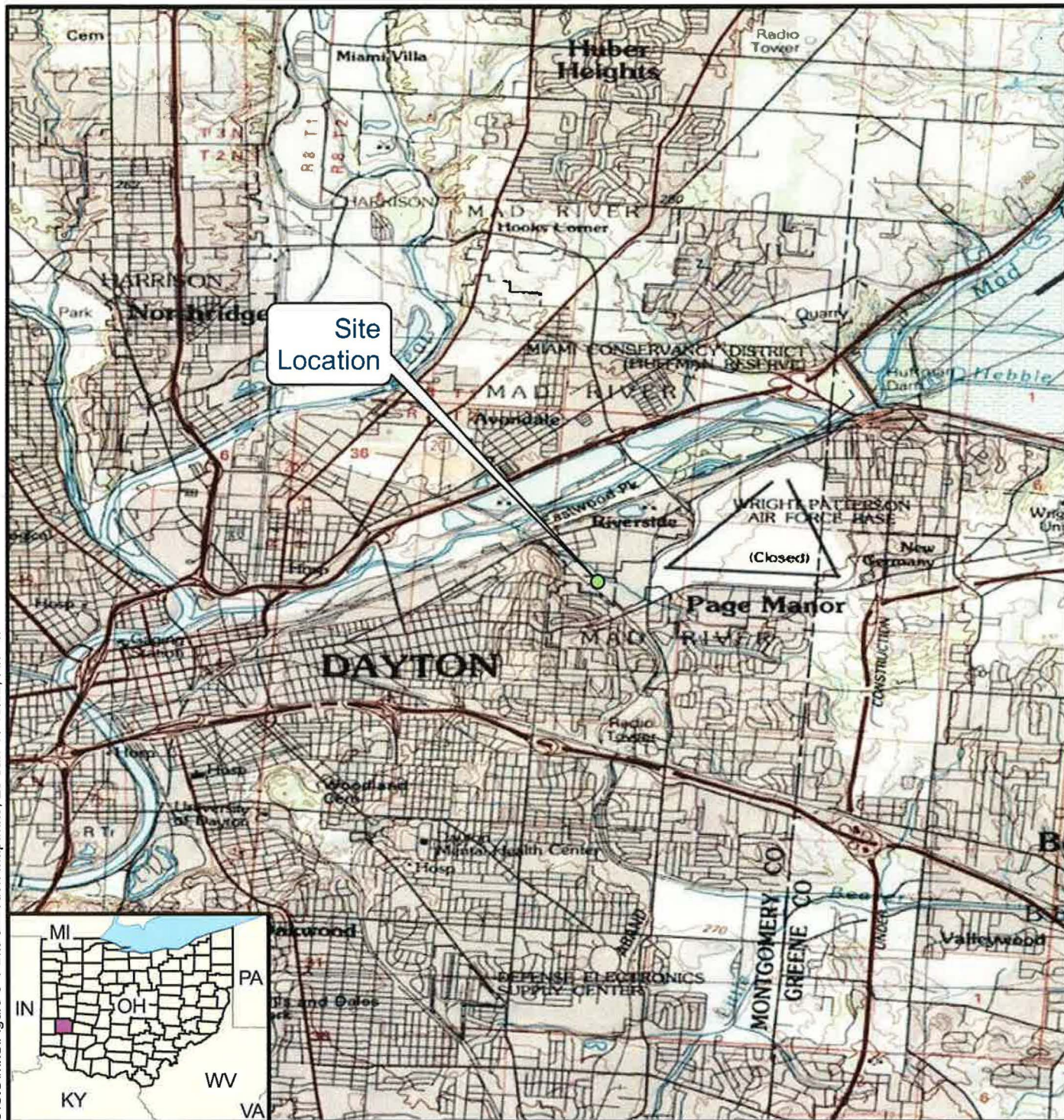


Image Source:
National Geographic Society

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Miles



Prepared for:
U.S. EPA Region 5
Contract No: EP-S5-06-04

TDD No.: S05-0001-1101-003
DCN: 1344-4H-ALIV

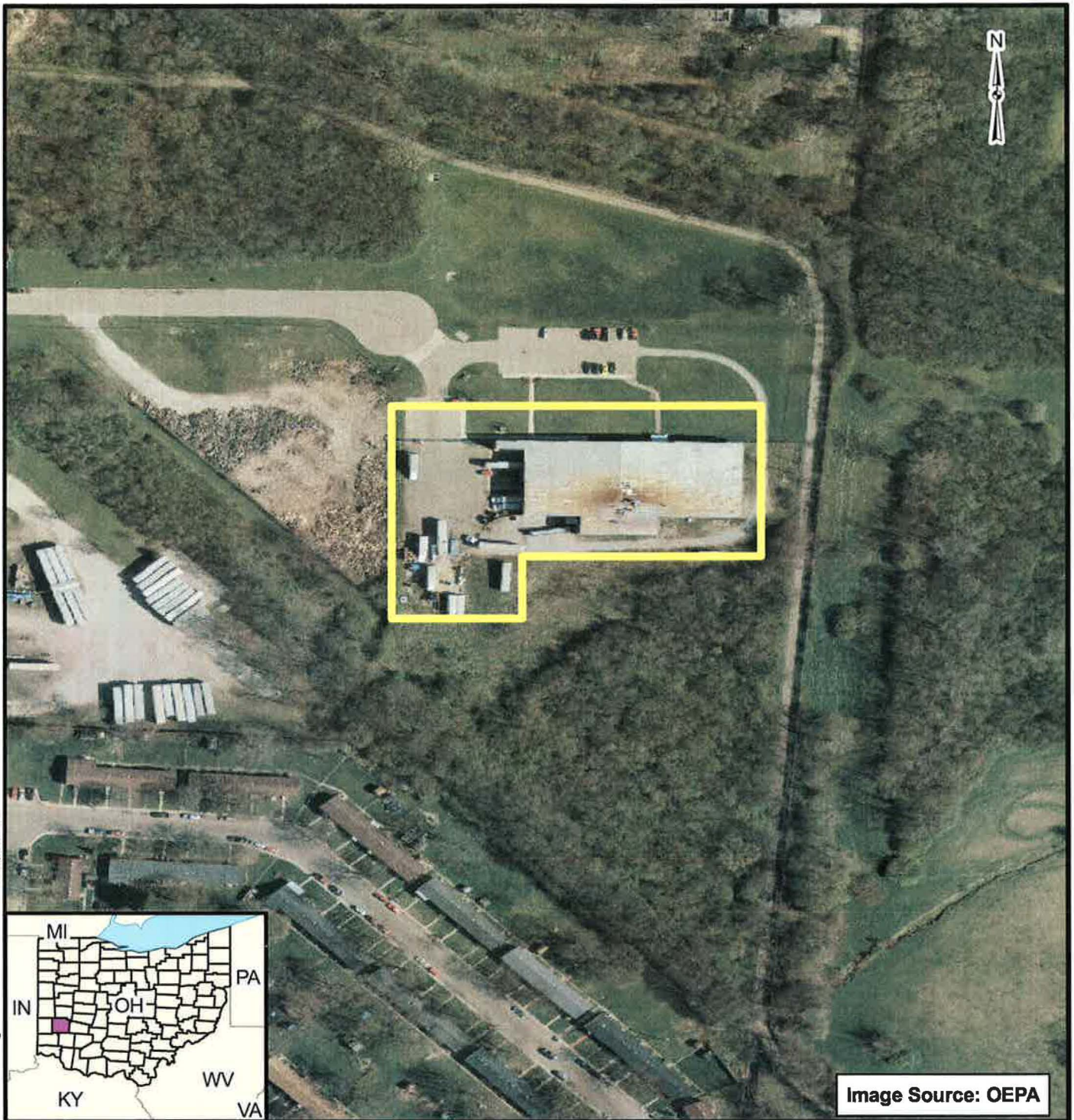


WESTON
SOLUTIONS

Weston Solutions, Inc.
4710-A Interstate Drive
Cincinnati, OH 45246

Figure A-1
Site Location Map
Multi-Service Site
Dayton, Montgomery County, Ohio

**ATTACHMENT 2
SITE LAYOUT MAP**



Legend

 Site Boundary

0 130 260
Feet

Prepared for:
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Weston Solutions, Inc.
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Figure A-2
Site Layout Map
Multi-Service Site
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ATTACHMENT 3
SITE FEATURES MAP

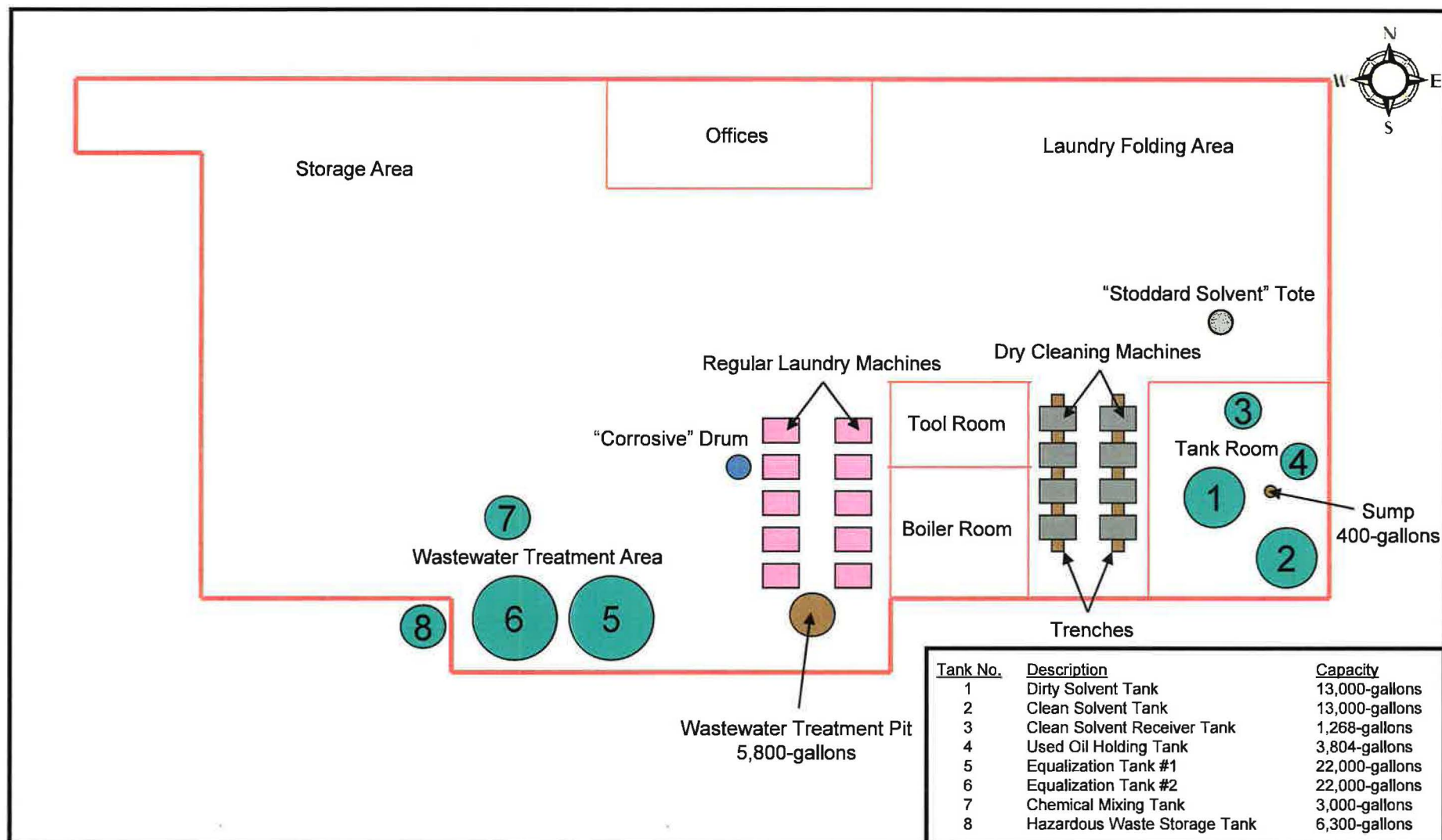


Figure 3-1



Prepared for:
U.S. EPA. REGION V
Contract No: EP-S5-06-04

TDD No.: S05-0001-1101-003
DCN: 1344-2A-ALVJ



Prepared by:
WESTON SOLUTIONS, INC.
4710-A Interstate Drive
Cincinnati, Ohio 45242

Site Features Map
Multi-Service Site
Dayton, Montgomery County, Ohio
Scale: Not to Scale

ATTACHMENT 4
HOSPITAL ROUTE MAP

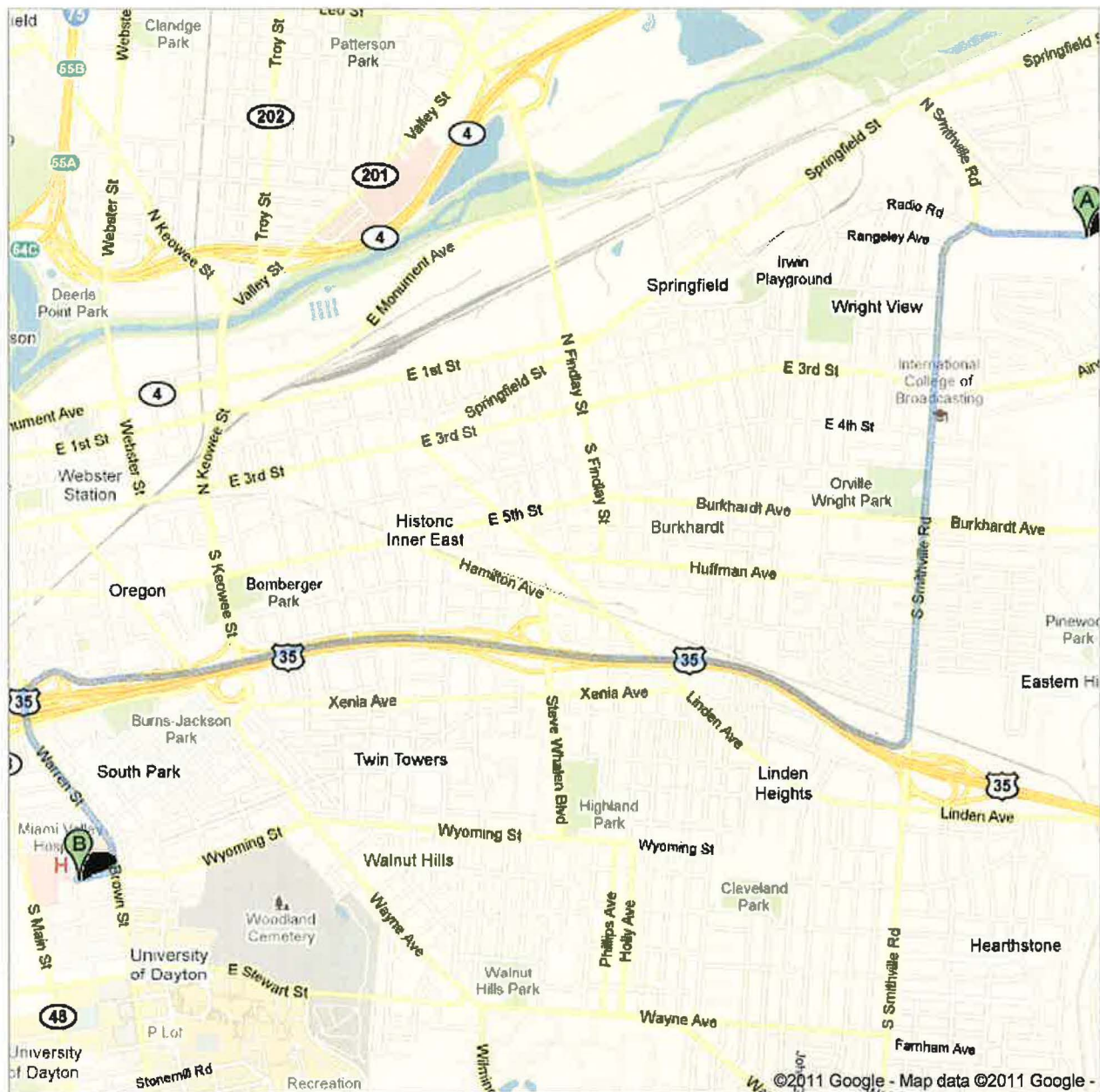


Directions to 1 Wyoming St, Dayton, OH 45440

5.3 mi – about 12 mins






Hospital Route Map

Multi-Service Site to Miami Valley Hospital





1962 Radio Rd, Dayton, OH 45431

1. Head **northwest** on **Radio Rd** toward **Pow Mia Memorial/N Smithville Rd**
About 1 min go 0.3 mi
total 0.3 mi
-  2. Take the 1st left onto **Pow Mia Memorial/N Smithville Rd**
Continue to follow N Smithville Rd
About 5 mins go 1.6 mi
total 1.9 mi
-  3. Slight right to merge onto **US-35 W** toward **Dayton**
About 2 mins go 2.2 mi
total 4.1 mi
-  4. Take the **Jefferson St** exit toward **OH-48/Dayton Convention Center/Main St**
About 1 min go 0.5 mi
total 4.6 mi
-  5. Turn left at **S Jefferson St**
About 2 mins go 0.1 mi
total 4.7 mi
6. Continue onto **Warren St**
About 1 min go 0.5 mi
total 5.2 mi
-  7. Turn right at **Wyoming St**
Destination will be on the right go 0.1 mi
total 5.3 mi



1 Wyoming St, Dayton, OH 45440

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2011 Google

Directions weren't right? Please find your route on maps.google.com and click "Report a problem" at the bottom left.

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ATTACHMENT 1
SITE LOCATION MAP

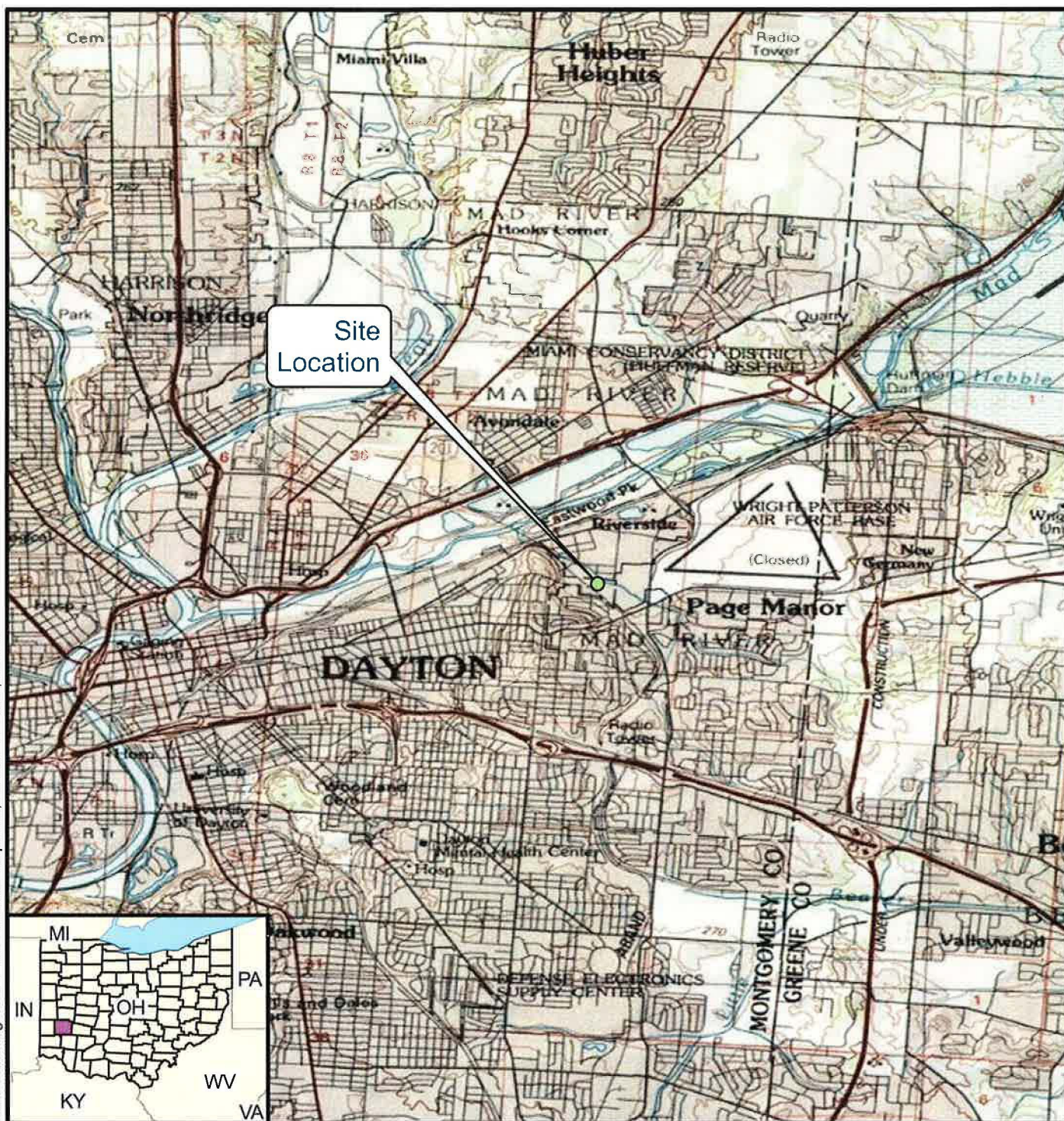


Image Source:
National Geographic Society

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Miles



Prepared for:
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DCN: 1344-4H-ALIV



WESTON
SOLUTIONS

Weston Solutions, Inc.
4710-A Interstate Drive
Cincinnati, OH 45246

Figure A-1
Site Location Map
Multi-Service Site
Dayton, Montgomery County, Ohio

**ATTACHMENT 2
SITE LAYOUT MAP**

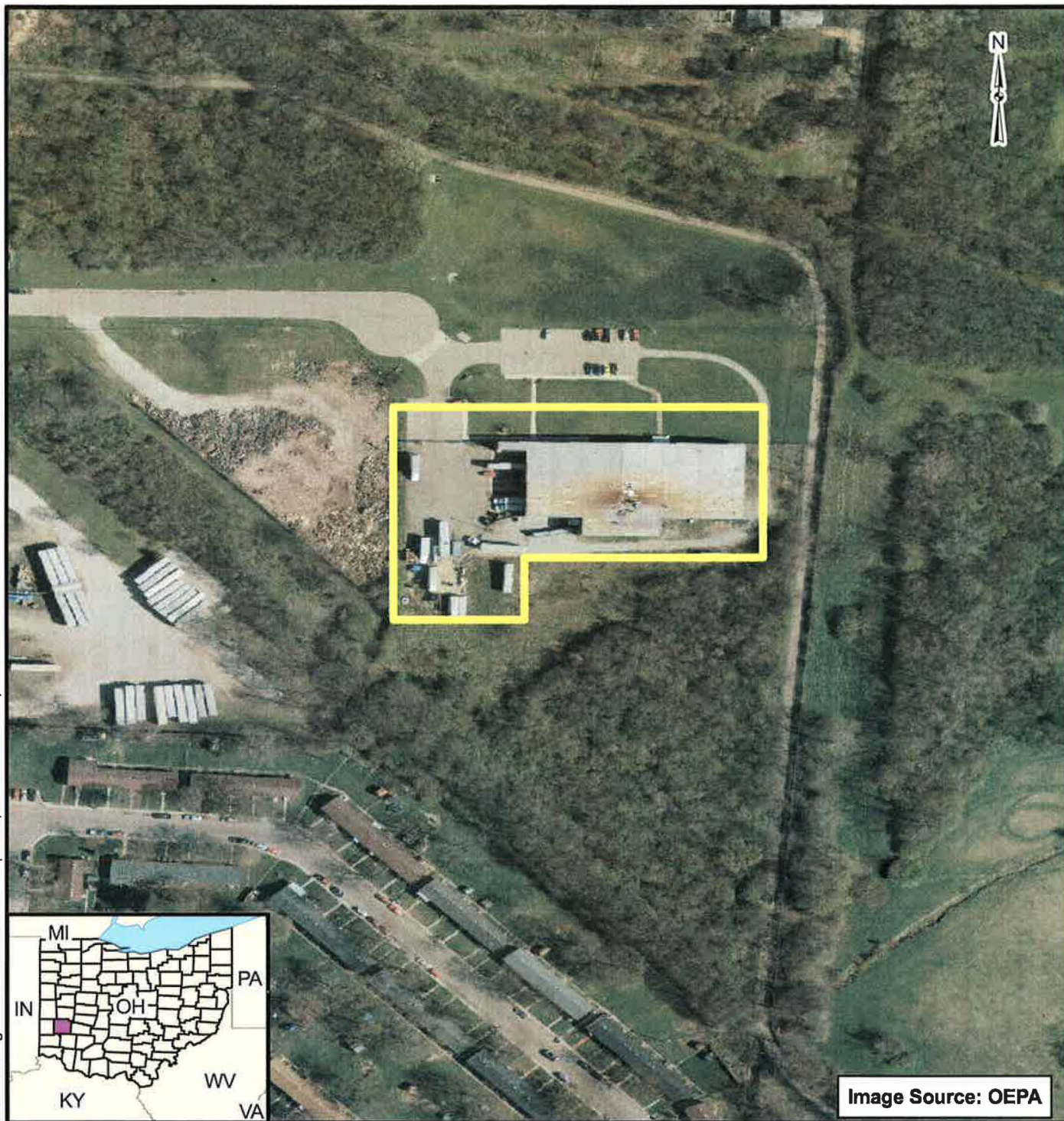


Image Source: OEPA

Legend

 Site Boundary

0 130 260
Feet

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SOLUTIONS

Weston Solutions, Inc.
4710-A Interstate Drive
Cincinnati, OH 45246

Figure A-2
Site Layout Map
Multi-Service Site
Dayton, Montgomery County, Ohio

ATTACHMENT 3
SITE FEATURES MAP

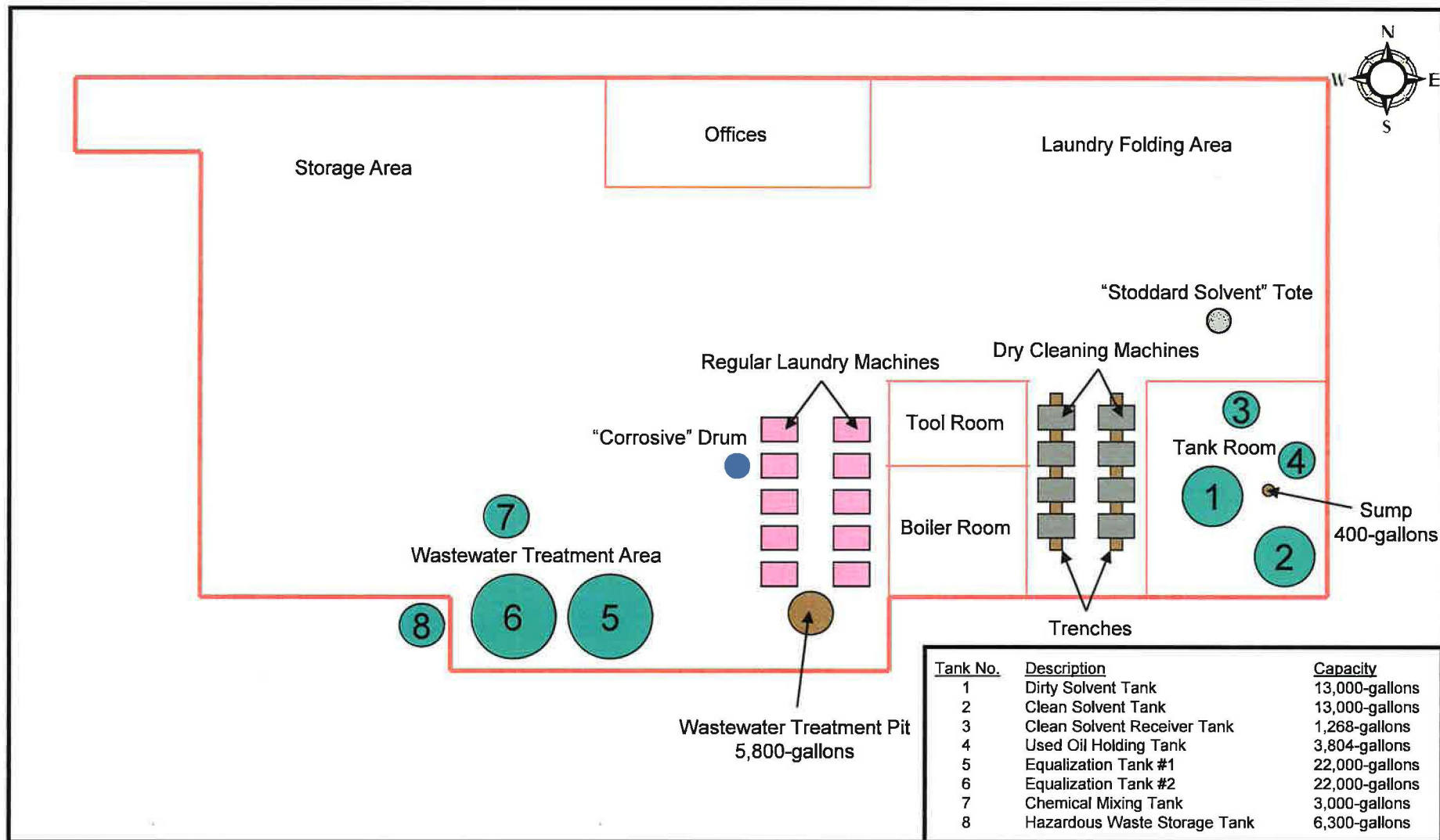


Figure 3-1



Prepared for:
U.S. EPA. REGION V
Contract No: EP-S5-06-04

TDD No.: S05-0001-1101-003
DCN: 1344-2A-ALVJ



Prepared by:
WESTON SOLUTIONS, INC.
4710-A Interstate Drive
Cincinnati, Ohio 45242

Site Features Map
Multi-Service Site
Dayton, Montgomery County, Ohio
Scale: Not to Scale

ATTACHMENT 4
HOSPITAL ROUTE MAP

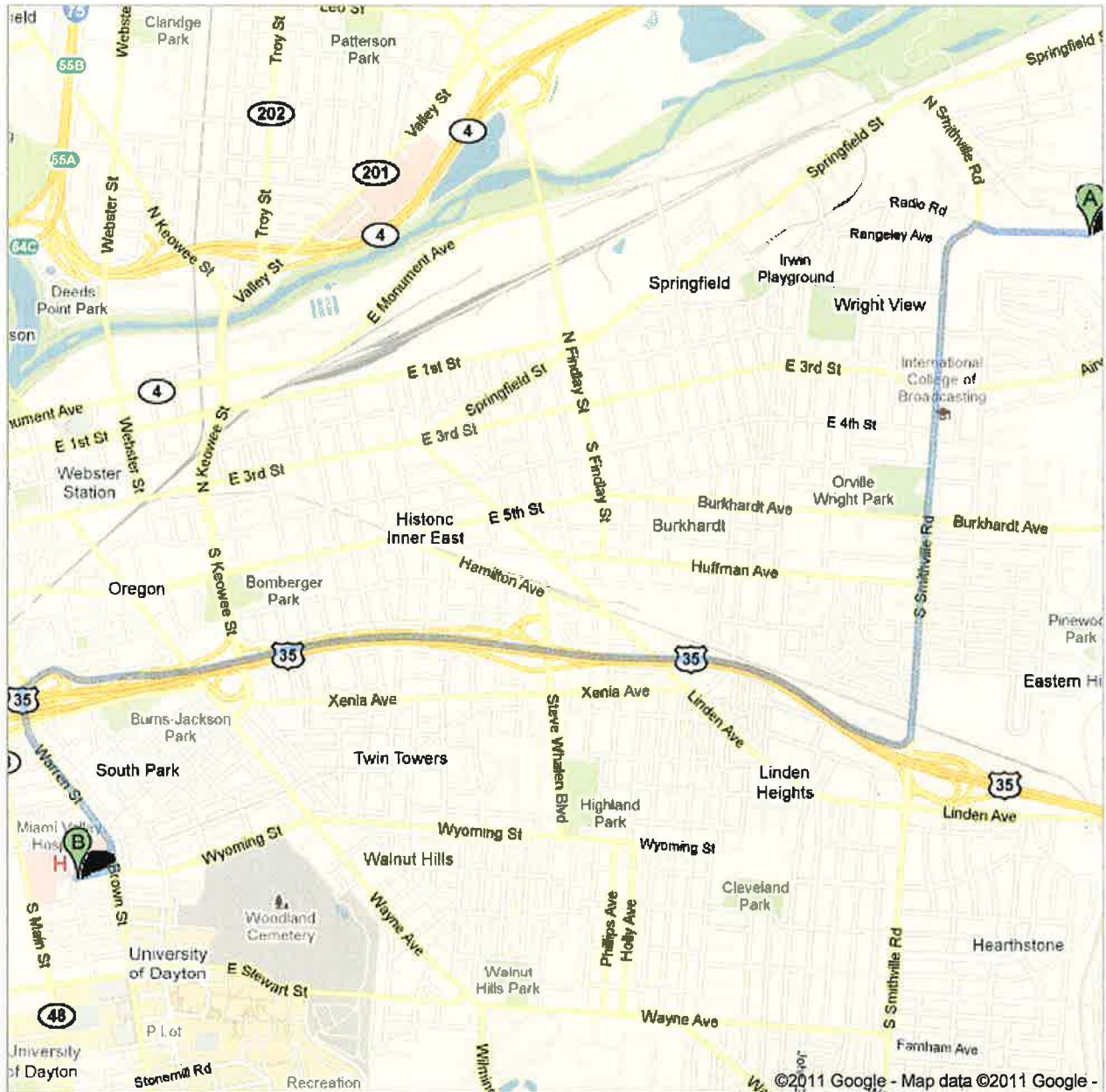


Directions to 1 Wyoming St, Dayton, OH 45440

5.3 mi – about 12 mins






Hospital Route Map

Multi-Service Site to Miami Valley Hospital





1962 Radio Rd, Dayton, OH 45431

-
- | | | |
|---|---|--------------|
| 1. | Head northwest on Radio Rd toward Pow Mia Memorial/N Smithville Rd | go 0.3 mi |
| | About 1 min | total 0.3 mi |
|  | 2. Take the 1st left onto Pow Mia Memorial/N Smithville Rd | go 1.6 mi |
| | Continue to follow N Smithville Rd | total 1.9 mi |
| | About 5 mins | |
|  | 3. Slight right to merge onto US-35 W toward Dayton | go 2.2 mi |
| | About 2 mins | total 4.1 mi |
|  | 4. Take the Jefferson St exit toward OH-48/Dayton Convention Center/Main St | go 0.5 mi |
| | About 1 min | total 4.6 mi |
|  | 5. Turn left at S Jefferson St | go 0.1 mi |
| | About 2 mins | total 4.7 mi |
| | 6. Continue onto Warren St | go 0.5 mi |
| | About 1 min | total 5.2 mi |
|  | 7. Turn right at Wyoming St | go 0.1 mi |
| | Destination will be on the right | total 5.3 mi |



1 Wyoming St, Dayton, OH 45440

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Map data ©2011 Google

Directions weren't right? Please find your route on maps.google.com and click "Report a problem" at the bottom left.